

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION

UNITED STATES OF AMERICA	)	DOCKET NO. 5:15-cr-38-KDB
	)	
v.	)	
	)	
SAI VANG	)	FACTUAL BASIS
<hr/>	)	

NOW COMES the United States of America, by and through R. Andrew Murray, United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

1. From in or about 2014 to in or about 2015, in Catawba County, within the Western District of North Carolina, and elsewhere, the defendant, SAI VANG, did knowingly and intentionally conspire to distribute and to possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

*[The rest of this page is intentionally left blank.]*

2. On or about May 27, 2015, in Catawba County, within the Western District of North Carolina, and elsewhere, the defendant, SAI VANG, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

WILLIAM T. STETZER  
ACTING UNITED STATES ATTORNEY

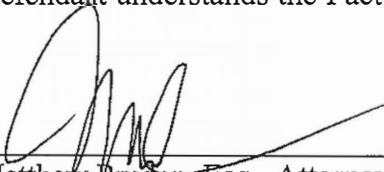


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STEVEN R. KAUFMAN  
ASSISTANT UNITED STATES ATTORNEY

**Defendant's Counsel's Signature and Acknowledgment**

I have read this Factual Basis, Superseding Indictment, and Plea Agreement in this case, and have discussed them with the Defendant. Based on those discussions, I am satisfied that the Defendant understands the Factual Basis, Superseding Indictment, and Plea Agreement.



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Matthew Pruden, Esq., Attorney for Defendant

DATED: 4/7/21